ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - - - - - - - - - - - - x

UNITED STATES OF AMERICA

- v. -

JONATHAN HUNTE,
a/k/a "Dwight Campbell,"

Defendant.

- - - - - - - - - - - - - - - - x

INDICTMENT

15 Cr. 15 CRIM 831

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: ________
DATE FILED: NOV 30 2015

COUNT ONE

(Mail Fraud)

The Grand Jury charges:

1. From at least on or about September 3, 2002 up to and including at least on or about August 7, 2014, in the Southern District of New York and elsewhere, JONATHAN HUNTE, a/k/a "Dwight Campbell," the defendant, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, for the purpose of executing such scheme and artifice and attempting so to do, did place in a post office and authorized depository for mail matter, matters and things to be sent and delivered by the Postal Service, and did deposit and cause to be deposited matters and things to be sent and delivered by private and commercial interstate carriers, and did take and receive

Judge Hellerstein

therefrom, such matters and things, and did cause to be delivered by mail and such carriers, according to the directions thereon, and at the places at which they were directed to be delivered by the person to whom they were addressed, such matters and things, to wit, HUNTE caused to be sent and received commissions and fees from insurance companies through the United States mails based on misrepresentations that he was "Dwight Campbell."

(Title 18, United States Code, Sections 1341 and 2.)

COUNT TWO

(Wire Fraud)

The Grand Jury further charges:

2. From at least on or about September 3, 2002 up to and including at least on or about August 7, 2014, in the Southern District of New York and elsewhere, JONATHAN HUNTE, a/k/a "Dwight Campbell," the defendant, willfully and knowingly having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations and promises, willfully and knowingly did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, to wit, HUNTE fraudulently represented himself as

"Dwight Campbell," and induced various insurance companies to pay him hundreds of thousands of dollars in commissions and fees relating to approximately 2,509 assigned risk applications, that were payable to another person.

(Title 18, United States Code, Sections 1343 and 2.)

COUNT THREE

(Aggravated Identity Theft)

The Grand Jury further charges:

3. From at least on or about September 3, 2002 up to and including at least on or about August 7, 2014, in the Southern District of New York and elsewhere, JONATHAN HUNTE, a/k/a "Dwight Campbell," the defendant, knowingly did transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, HUNTE used the name and license number of another person during and in relation to the offense charged in Count One of this indictment.

(Title 18, United States Code, Sections 1028A(a)(1) and 2.)

FORFEITURE ALLEGATION AS TO COUNTS ONE AND TWO

4. As a result of committing the offenses charged in Counts One and Two of this Indictment, JONATHAN HUNTE, a/k/a "Dwight Campbell," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section

981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes, or is derived from, proceeds traceable to the commission of the offenses charged in Counts One and Two of this Indictment.

SUBSTITUTE ASSET PROVISION

5. If any of the above-described forfeitable property, as a result of any act or omission of JONATHAN HUNTE, a/k/a "Dwight Campbell," the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

e. has been commingled with other property that cannot be subdivided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendants up to the value of the forfeitable property.

(Title 18, United States Code, Sections 981(a)(1)(C), 982(a)(2)(B) and (b)(1), and 1029(c)(1)(C), Title 21, United

(Title 18, United States Code, Sections 981(a)(1)(C), 982(a)(2)(B) and (b)(1), and 1029(c)(1)(C), Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c).)

FOREPERSON

PREET BHARARA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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INDICTMENT

15 Cr.

(18 U.S.C. §§ 1341, 1343, 1028A, and 2.)

PREET BHARARA
United States Attorney

Foreperson

11/30/15
Filed Indictment
on
Judge Netburn